

Bureau of Land Management  
California Desert District Office  
Attn: WMRNP Plan Amendment  
22835 Calle San Juan de Los Lagos  
Moreno Valley, CA 92553  
[cawemopa@blm.gov](mailto:cawemopa@blm.gov)

June 2, 2015

Chuck Bell, President  
Lucerne Valley Economic Development Association  
P.O. Box 193  
Lucerne Valley, CA 92356  
[chuckb@sisp.net](mailto:chuckb@sisp.net)  
760-964-3118

**Re: Draft West Mojave Route Network Project Land Use Plan Amendment to the California Desert Conservation Area Plan and Draft Supplemental Environmental Impact Statement**

To Whom It May Concern:

This letter is on behalf of the Lucerne Valley Economic Development Association (LVEDA)

### **GRAZING**

We endorse BLM's Preferred Alternative – to maintain the existing grazing allotments in the West Mojave – operating pursuant to existing status – with existing AUM allocations – with the normal 10 year authorizations. We question the need to raise the dry weight threshold. Ranchers will deal with drought conditions long before the time comes to measure ephemerals. Any reduction or elimination of grazing rights would not only be an adverse 'taking' – it would violate the hard work and agreements between the Bureau of Land Management (BLM) and the ranchers over the years – with the realization that these allotments could eventually become mitigation/compensation for impacts from other projects within the region – an important option for ranchers if they so desire.

We would support re-entry of grazing into vacated allotments in the West Mojave if they have not been officially 'relinquished' for Fort Irwin's expansion. It is important to note that existing 'approved' routes within the allotments currently create trespass/vandalism problems. Those added in Alternative 3 to both Ord and Rattlesnake Allotments will exacerbate the hardship for both the ranchers and BLM. We oppose the addition of any 'open' routes within said cattle allotments.

## **ROUTES**

This aspect of the 'Plan' is too overwhelming to make specific comments. The rationale for the doubling of routes since the 2006 Plan based on 'new inventories' infers that the 2006 Plan was way off base – which is hard to believe. Are these 'new found' routes really there – on the ground – are they really 'routes'? It looks as if there will be conflicts with County-maintained roads – with more 'opportunities' for green-sticker OHVs to use said roads in violation of the 'street legal' requirements – creating a major problem for the County Transportation Department, law enforcement, residents (private land trespass), etc. It could be inconsistent with the County's OHV Ordinance. The rationale that even with the increase in 'routes' – there will be no net increase in use or OHV miles travelled is both bewildering and intriguing – but certainly worth a discussion.

Did BLM do their customary three C's: Cooperation, Consultation, and Coordination with the County – especially 'coordination' in drafting this Plan? LVEDA believes that the only productive way to better understand/deal with the route issues would be to have a meeting with both County representatives and BLM to get a better understanding of what's really in the plan and view maps that are readable with topo features, etc. BEFORE any final decision is made.

Sincerely,

Chuck Bell  
LVEDA, President